

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ELIZABETH MARTIN

PLAINTIFF

v.

CAUSE NO. 3:20-cv-460-CWR-LGI

PATRICIA MARSHALL

DEFENDANT

**DEFENDANT’S RESPONSE IN OPPOSITION TO PLAINTIFF’S
MOTION TO SEAL**

COMES NOW, the Defendant, Patricia Marshall, and files this her Response in opposition to the Plaintiff’s Motion to Seal and in support thereof states as follows:

1. The Plaintiff filed a motion to seal unnamed document and the file in this case.
(*ECF Doc. # 56*).
2. Sealing a case is controlled by Rule 79 of the Local Rules.
3. The Plaintiff’s request is deficient.
4. The Plaintiff has failed to submit a supporting memorandum.
5. The Plaintiff has failed to specifically request who does or does not have access pursuant to Local Rule 79(e)(3)(B).
6. The Plaintiff has failed to provide governing case law.
7. Given these deficiencies, the Plaintiff’s request must be denied.
8. Patricia Marshall incorporates by reference the arguments made in her memorandum.
9. Patricia Marshall incorporates the following exhibits in her response:

Exhibit A: Email from UCLA Law School Professor, Eugene Volokh
to Wayne Ferrell and Christian Medina

10. For the reasons set forth above and in her Memorandum, this Court must deny the Plaintiffs' request.

RESPECTFULLY SUBMITTED, this the 18th day of November, 2021.

Patricia Marshall, Defendant

By: /s/ Christian Medina
Christian Medina

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify the foregoing pleading was filed electronically with the Clerk of Court and served on the following persons using the CM/ECF:

Wayne E. Ferrell, Jr.
Law Offices of Wayne E. Ferrell, Jr.
P.O. Box 24448
Jackson, MS 39225

This the 18th day of November, 2021.

/s/ Christian Medina
Christian Medina